

Exhibit D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

COURTNEY LINDE, et al.,

Plaintiffs,

-against-

ARAB BANK, PLC,

Defendant/Third-Party
Plaintiff,

-against-

BANK HAPOALIM, et al.,

Third-Party Defendants.

PHILIP LITTLE, et al.,

Plaintiffs,

-against-

ARAB BANK, PLC,

Defendant/Third-Party
Plaintiff,

-against-

BANK HAPOALIM, et al.,

Third-Party Defendants.

DEPOSITION OF FATIMA KARKABI
Tel Aviv, Israel
July 24, 2008

Reported by: BRENDA MATZOV, CA CSR 9243

1 F. KARKABI
2 ORAN ALMOG, et al., :
3 Plaintiffs, :
4 -against- : Case No.:
5 ARAB BANK, PLC, : CV 04 5564(NG)(VVP)
6 Defendant/Third-Party :
7 Plaintiff, :
8 -against- :
9 BANK HAPOALIM, et al., :
10 Third-Party Defendants. :
11 _____ :
12 ROBERT L. COULTER, SR., FOR :
13 THE ESTATE OF JANIS RUTH :
14 COULTER, et al., :
15 Plaintiffs, :
16 -against- : Case No.:
17 ARAB BANK, PLC, : CV 05 365(NG)(VVP)
18 Defendant/Third-Party :
19 Plaintiff, :
20 -against- :
21 BANK HAPOALIM, et al., :
22 Third-Party Defendants. :
23 _____ :
24 :
25 :

1 F. KARKABI
2 GILA AFRIAT-KURTZER, et al., :
3 Plaintiffs, :
4 -against- : Case No.:
5 ARAB BANK, PLC, : CV 05 388(NG)(VVP)
6 Defendant/Third-Party :
7 Plaintiff, :
8 -against- :
9 BANK HAPOALIM, et al., :
10 Third-Party Defendants.:
11 _____ :
12 MICHAEL BENNETT, et al., :
13 Plaintiffs, :
14 -against- : Case No.:
15 ARAB BANK, PLC, : CV 05 3183(NG)(VVP)
16 Defendant/Third-Party :
17 Plaintiff, :
18 -against- :
19 BANK HAPOALIM, et al., :
20 Third-Party Defendants.:
21 _____ :
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1 F. KARKABI
2 ARNOLD ROTH, et al., :
3 Plaintiffs, :
4 -against- : Case No.:
5 ARAB BANK, PLC, : CV 05 3738(NG)(VVP)
6 Defendant/Third-Party :
7 Plaintiff, :
8 -against- :
9 BANK HAPOALIM, et al., :
10 Third-Party Defendants. :
11 STEWART WEISS AND SUSAN WEISS, :
12 et al., :
13 Plaintiffs, :
14 -against- : Case No.:
15 ARAB BANK, PLC, : CV 06 1623(NG)(VVP)
16 Defendant/Third-Party :
17 Plaintiff, :
18 -against- :
19 BANK HAPOALIM, et al., :
20 Third-Party Defendants. :
21 :
22 :
23 :
24 :
25 :

1 F. KARKABI
2 JOSEPH JESNER, et al., :
3 Plaintiffs, :
4 -against- : Case No.:
5 ARAB BANK, PLC, : CV 06 3869(NG)(VVP)
6 Defendant/Third-Party :
7 Plaintiff, :
8 -against- :
9 BANK HAPOALIM, et al., :
10 Third-Party Defendants.:
11 _____ :
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1 F. KARKABI

2 Deposition of FATIMA KARKABI, taken in the
3 above-entitled cause pending in the United States
4 District Court, Eastern District of New York,
5 pursuant to notice, before BRENDA MATZOV, CA
6 CSR 9243, at the Dan Tel Aviv Hotel, 99 Hayarkon
7 Street, Crown Room, Tel Aviv, Israel, on Thursday,
8 the 24th day of July, 2008, at 1:28 p.m.
9

10 APPEARANCE OF COUNSEL:

11 FOR PLAINTIFF:

12 MOTLEY RICE, LLC

By: JOHN M. EUBANKS, ESQ.

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14 843.216.9000

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15
16 FOR DEFENDANT:

17 DEWEY & LeBOEUF, LLP

By: FRANKLIN G. MONSOUR, ESQ.

18 -and-

APRIL L. READLINGER, ESQ.

19 125 West 55th Street

New York, New York 10019

20 212.424.8000

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21 areadlinger@dl.com

22 ALSO PRESENT:

23 AMA SHEHADEH, Arabic Interpreter

24 ENAS MUTHAFFAR, Arabic Interpreter

25 RON LEVY and KEREN HAZAN

F. KARKABI

I N D E X

WITNESS

Fatima Karkabi

EXAMINATION

PAGE

By Mr. Monsour

8

By Mr. Eubanks

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E X H I B I T S

(None.)

Q U E S T I O N S I N S T R U C T E D

N O T T O A N S W E R

(None.)

R E Q U E S T E D I N F O R M A T I O N

(None.)

1 F. KARKABI

2 P R O C E E D I N G S

3
4 AMA SHEHADEH

5 -AND-

6 ENAS MUTHAFFAR,

7 the interpreters, were duly affirmed
8 to translate from English to Arabic
9 and from Arabic to English.

10
11 FATIMA KARKABI,

12 called as a witness, being first duly
13 affirmed, was examined and testified
14 as hereinafter set forth:

15
16 (The proceedings were conducted through
17 the Arabic interpreters, unless otherwise
18 indicated.)

19
20 EXAMINATION

21 BY MR. MONSOUR:

22 Q. Good afternoon, Ms. Karkabi. My name
23 is Franklin Monsour. I'm going to ask you some
24 questions today about your lawsuit.

25 Before we get started, I will go over

1 F. KARKABI

2 a few guidelines to help us with the proceeding.
3 Because we have a court reporter taking down
4 everything that we say, it's important to give
5 verbal responses to the questions so that she may
6 take them down for the record.

7 Occasionally, your attorney will object
8 to some of my questions. However, you're still to
9 answer my questions unless your attorney tells you
10 specifically not to. If at any point you don't
11 understand a question that I ask, just let me know,
12 and I will try to rephrase it and make it more
13 understandable.

14 If you want to take a break at any point,
15 let me know. That won't be a problem. I'd just
16 ask that we not take a break while a question is
17 pending.

18 Have you been able to understand these
19 instructions so far through the interpreter?

20 A. Yes, I did.

21 Q. Okay. You're under oath for this
22 proceeding, Ms. Karkabi, which means, in answering
23 the questions that are posed to you, you have to
24 give answers to the fullest of your knowledge and
25 truthful to the best of your knowledge.

1 F. KARKABI

2 And as a formality, are you under the
3 influence of any medications today that might
4 inhibit your ability to give testimony?

5 A. No, no, no. I didn't take anything.

6 Q. Thank you. Ms. Karkabi, I'm going to
7 begin by asking some general background questions.

8 Can you give me the date of your birth,
9 please?

10 A. 14th of May, 1968.

11 Q. Where were you born?

12 A. Haifa.

13 Q. Have you lived your whole life in Haifa?

14 A. Yes, all my life. And I still do.

15 Q. Do you have any citizenships besides with
16 Israel?

17 A. No.

18 Q. Are you currently married?

19 A. Yes.

20 Q. For how long have you been married?

21 A. Twenty years.

22 Q. Can you give me the name and age of your
23 husband, please?

24 A. His name is Tanan, and he's 49.

25 Q. Do you have any children?

1 F. KARKABI

2 A. Yes, I have.

3 Q. Can you give me their names and ages,
4 please?

5 A. I have five children. Sohaila, 19 years
6 and a half. Ahlam, 18 years old. Jasmine, 16 and
7 nine months. And Dawad, 15 years old. And Juna,
8 8 years old.

9 Q. Thank you.

10 Do all of your children live with you in
11 Haifa?

12 A. I live with them under the same ceiling.

13 Q. Ms. Karkabi, are you currently employed?

14 A. Yes, I work.

15 Q. Where do you work?

16 A. I work with elderly people as a -- a day
17 care for elderly people and also in their houses as
18 a cleaner.

19 Q. Do you work privately or for a company?

20 A. Independently.

21 Q. How long have you been in this line of
22 work?

23 A. It's been seven years and a half.

24 Q. And for that seven and a half years, have
25 you done this work independently?

1 F. KARKABI

2 A. I started working through an office.
3 And then the old lady died. So I started working
4 independently.

5 Q. And on average, how many hours a week do
6 you work?

7 A. Per week or per day? Per day, it's
8 easier.

9 Q. Per day. That's fine. Please.

10 A. Between eight to nine hours and a half.
11 But it depends since I take the buses. So I cannot
12 tell you exactly how many. But between eight to
13 nine hours and a half.

14 THE INTERPRETER: I want to complement
15 what she was saying.

16 THE WITNESS: I usually return home around
17 8:00 -- or I start from 8:00 o'clock in the morning,
18 and I finish around 5:00 to 6:00. It depends on the
19 hours I work.

20 Q. BY MR. MONSOUR: Thank you.

21 What job did you have prior to working as
22 a caretaker?

23 A. I worked for a while as a seller. And for
24 another period of time, I worked as a cashier.

25 I would like to add something small.

1 F. KARKABI

2 At the beginning, I didn't work that many hours.
3 Before seven years, I used to work between four to
4 five hours a day. So I would leave between 1:00 to
5 2:00 p.m. But now, lately, I've been working that
6 many hours a day.

7 Q. And for how long of a period of time have
8 you been working from around 8:00 a.m. to 5:00 to
9 6:00 p.m.?

10 THE INTERPRETER: Can you repeat the
11 question?

12 Q. BY MR. MONSOUR: Sure. For how long of
13 a period of time have you been working from around
14 8:00 a.m. to 5:00 or 6:00 p.m.?

15 A. Since my brother passed away.

16 Q. Where did you work as a seller?

17 A. In a shop. In a shop located in the
18 Hadar. In an independent shop. It's not like a
19 supermarket. It's a shop, a small shop.

20 Q. Was this your shop, or did you work for
21 someone?

22 A. I was working for someone. I worked as
23 a seller and as a cashier also. It depends if the
24 owner was there present or not. Sometimes I took
25 care of the money, and sometimes he did.

1 F. KARKABI

2 Q. And was this in Haifa?

3 A. Yes.

4 Q. Where at in Haifa?

5 A. Would you like to know the name of the
6 street?

7 Q. The neighborhood and the street.

8 A. Hadar neighborhood, Halutz Street.

9 Q. And for how long did you work there?

10 A. I don't remember exactly.

11 Q. Ms. Karkabi, what is your educational
12 background?

13 A. I completed the 12th elementary class.
14 And then I took a secretary course.

15 Q. Is your husband currently employed?

16 A. Sure.

17 Q. What does he do for a living?

18 A. He's a carpenter.

19 Q. Does he also work in Haifa?

20 A. He works in Kiryat Bialik.

21 Q. How long has he had that job?

22 A. Since he was 18 years old. He's a
23 carpenter.

24 Q. Does he work for a specific company now?

25 A. He works with a certain factory.

1 F. KARKABI

2 Q. How long has he worked for the factory?

3 A. It has been -- I cannot really tell you
4 exactly. But for about seven to ten years, he had
5 a shop, his own carpentry shop. And then he closed
6 it and returned back to the factory.

7 Q. From when to when did he own his own shop?

8 A. Do you mean the shop?

9 Q. You said that he owned his own private
10 shop; is that correct?

11 A. It was before he married me. That's 20
12 years ago. So I cannot really tell you between
13 which year and which year.

14 Q. Okay.

15 THE INTERPRETER: Sorry for interrupting.
16 There was a mistake in the interpretation.

17 What she said is like this.

18 "He owned a carpenter shop. Then he
19 closed it and opened his own shop."

20 She didn't specify what kind of shop.

21 "Then he closed it and moved to work for a
22 factory. And he closed that second shop when we got
23 married."

24 Q. BY MR. MONSOUR: Okay. What does your
25 oldest child do for a living?

1 F. KARKABI

2 A. My daughter, you mean?

3 Q. Yes.

4 A. You mean my daughter, my eldest daughter.

5 She studies business management. And she works in a
6 kind of a supermarket. She manages the shelves.

7 Q. And are your other children in school?

8 A. Ahlam finished school this year. And the
9 rest are in school.

10 Q. What is Ahlam doing?

11 THE INTERPRETER: She's using Hebrew
12 sometimes in the middle of the sentence in Arabic.

13 MR. MONSOUR: I can tell.

14 THE WITNESS: She just started working in
15 a shop for homemade tools.

16 Q. BY MR. MONSOUR: Ms. Karkabi, have you
17 ever traveled outside of Israel?

18 A. I traveled three times to Egypt, to Taba,
19 and to Jordan. And it was for pleasure.

20 Q. When was the last time that you traveled
21 outside of Israel?

22 A. Last year.

23 Q. Where did you go?

24 A. Jordan.

25 Q. How long did you stay?

1 F. KARKABI

2 A. Four days.

3 Q. Who did you travel with?

4 A. With my husband.

5 Q. And prior to that, when was the last time
6 that you traveled outside of Israel?

7 A. To Taba with my husband and to Egypt with
8 my husband.

9 Q. When was that?

10 A. The first time to Egypt, it was like our
11 honeymoon when we got married. And the second time
12 was when my brother passed away, a year after my
13 brother passed away. It's like after the mourning
14 year.

15 Q. What part of Egypt did you go to?

16 A. Cairo and Alexandria.

17 Q. Was it just you and your husband?

18 A. It was only us.

19 Q. Have you ever traveled to the United
20 States?

21 A. Never. I wish.

22 Q. Ms. Karkabi, where were your parents born?

23 A. My father in Shefaram. And my mother is
24 from Nazareth. If I was to say where they were
25 born, in Israel, in brief.

1 F. KARKABI

2 Q. And your mother is from Nazareth; is that
3 correct?

4 A. Yes.

5 Q. Where do your parents live now?

6 A. They live in Haifa.

7 Q. How about your husband's parents, where
8 are they from?

9 A. The family of my husband are from
10 Fassouta. And even my husband was born in Fassouta.

11 Q. How long did your father stay in Shefaram?

12 A. I don't know. I know nothing about my
13 father's childhood.

14 Q. When was he born?

15 A. I can't remember.

16 Q. Did he ever tell you that he was expelled
17 from Shefaram?

18 A. No. Maybe his family did leave Shefaram.
19 We never really discussed his childhood or his life
20 in Shefaram.

21 Q. Did he ever tell you why his family left?

22 A. No.

23 Q. Did he ever tell you about fighting that
24 went on in Israel when he was a kid?

25 A. Which fighting?

1 F. KARKABI

2 Q. Between Arabs and Israelis.

3 A. No.

4 Q. No?

5 A. No.

6 Q. Have you ever heard that Arabs were
7 expelled from Shefaram?

8 MR. EUBANKS: Objection. Foundation.

9 THE WITNESS: No, I didn't hear.

10 Q. BY MR. MONSOUR: Do you have any family
11 that's from Tzipori?

12 A. No.

13 Q. Have you ever been to Tzipori?

14 A. No.

15 Q. It's close to Haifa; right?

16 MR. EUBANKS: Objection. Foundation.

17 THE WITNESS: Even so.

18 Q. BY MR. MONSOUR: Have you ever heard of
19 the Tzipori massacre?

20 MR. EUBANKS: Objection. Foundation.

21 THE WITNESS: No.

22 Q. BY MR. MONSOUR: Have you ever heard that
23 thousands and thousands of Arabs were expelled from
24 Tzipori and not allowed to return to their homes?

25 MR. EUBANKS: Objection. Foundation.

1 F. KARKABI

2 THE WITNESS: No.

3 Q. BY MR. MONSOUR: You've never heard about
4 this your entire life?

5 A. No.

6 Q. Have you ever heard about Arabs returning
7 to Tzipori to celebrate having come from there and
8 to protest not being allowed to return once a year?

9 MR. EUBANKS: Objection. Foundation.

10 THE WITNESS: Never heard about it.

11 Q. BY MR. MONSOUR: Do you have any family
12 from Egrat or Bra'am?

13 A. My brother-in-law from my sister's side.

14 Q. Does he live there now?

15 A. He lives in Haifa.

16 Q. How long did he live there?

17 A. I don't know if he lived there or he
18 didn't. If he was born there or not, I don't know.
19 I know only that he originally came from there.

20 Q. Could he live there now if he wanted to?

21 MR. EUBANKS: Objection. Foundation.

22 THE WITNESS: I don't know.

23 Q. BY MR. MONSOUR: Have you ever heard of
24 Arabs being expelled from Bra'am?

25 MR. EUBANKS: Objection. Foundation.

1 F. KARKABI

2 THE WITNESS: No, I don't know.

3 Q. BY MR. MONSOUR: And just so we're clear,
4 under oath today, in your entire life, you've never
5 heard of this?

6 MR. EUBANKS: Objection. Form.

7 THE WITNESS: I heard something about
8 this, but with no details. So I know that it
9 happened. But how and when, I don't know.

10 Q. BY MR. MONSOUR: Have you ever heard that
11 the Israeli military bombed those villages so that
12 Arabs cannot return to their homes?

13 MR. EUBANKS: Objection. Foundation.

14 THE WITNESS: No, I don't.

15 Q. BY MR. MONSOUR: Has your brother-in-law
16 ever spoken to you about Bra'am?

17 A. No.

18 Q. What is his name?

19 A. Phillip.

20 Q. And his last name?

21 A. Atala.

22 Q. Does he still have family in Bra'am?

23 A. I don't know exactly. But I know that
24 also his mother and father do live in Haifa now.

25 Q. Do you know when they moved to Haifa?

1 F. KARKABI

2 A. No.

3 Q. Have you ever been to Egrat or Bra'am?

4 A. No. Not even one time.

5 Q. Not in a long time?

6 A. I never entered there.

7 Q. Do you have any desire to?

8 A. To see the area, I don't have a rejection.
9 But if I go there, I'll go there.

10 Q. Would you be allowed to enter if you
11 wanted to?

12 MR. EUBANKS: Objection. Foundation.

13 THE WITNESS: What do you mean? That they
14 will allow me to enter?

15 Q. BY MR. MONSOUR: Would you be allowed to
16 enter the village if you wanted to?

17 MR. EUBANKS: Objection. Foundation.

18 THE WITNESS: Is there someone that could
19 reject to someone visit a village?

20 Q. BY MR. MONSOUR: I'm asking you the
21 question.

22 A. I don't know.

23 Q. Would you be allowed to buy property there
24 if you wanted to?

25 MR. EUBANKS: Objection. Foundation.

1 F. KARKABI

2 THE WITNESS: I don't know about this.
3 I don't want to even buy property there. Why would
4 I buy property there?

5 Q. BY MR. MONSOUR: Do you have any family
6 from Darhana?

7 A. No.

8 Q. Have you ever been to Darhana?

9 A. No.

10 Q. And have you ever heard of Arabs being
11 expelled from Darhana?

12 MR. EUBANKS: Objection. Foundation.

13 THE WITNESS: No.

14 Q. BY MR. MONSOUR: Do you know anyone from
15 Darhana?

16 A. I don't know anybody there.

17 Q. In your whole life in Israel, are you
18 aware of Arabs being expelled from anywhere in
19 Israel?

20 A. No.

21 Q. Have you ever heard of Arabs being
22 expelled from Haifa?

23 A. Also no. Since I was born, I didn't hear
24 something about that.

25 Q. How about have you heard this about prior

1 F. KARKABI

2 to when you were born?

3 THE INTERPRETER: Could you repeat that?

4 Q. BY MR. MONSOUR: Sure. Have you heard
5 this about prior to when you were born?

6 MR. EUBANKS: Objection. Foundation.

7 THE WITNESS: No.

8 Q. BY MR. MONSOUR: You never studied this in
9 history?

10 A. No. In the history we study, they don't
11 teach these things.

12 Q. Why don't they teach these things?

13 MR. EUBANKS: Objection. Foundation.

14 THE WITNESS: Go and ask them.

15 Q. BY MR. MONSOUR: Did you attend a school
16 in Arabic?

17 A. Yes. In a nuns' school.

18 Q. In a nuns' school.

19 Was this a Catholic school?

20 A. It's a nuns' school called Carmelit. It's
21 a Catholic school.

22 Q. Okay. What did they teach you in school
23 about the history of Arabs and Israelis?

24 A. Yes. They teach us about the history of
25 Islam, about Prophet Muhammad, and the Rashidin

1 F. KARKABI

2 fellows. And they also teach us about the Second
3 World War -- I'm sorry -- the First World War.

4 Q. And did they teach you about any of the
5 controversial aspects of land being taken from Arabs
6 by Israelis?

7 MR. EUBANKS: Objection. Foundation.

8 THE WITNESS: No. No, they don't.

9 Q. BY MR. MONSOUR: Do they avoid talking
10 about these subjects in the school that you went to?

11 A. Where I studied, they didn't talk about
12 these things. And even for now, for my children,
13 they don't discuss these things in the school.

14 But when there is a terrorism action or
15 a bombing, they discuss it in the school. Even my
16 kids sometimes come and talk to me about it.

17 They tell me about it. Because sometimes
18 the kids themselves will die in this bus accident.
19 They come to me and talk about it. Like, for
20 example, in Bus 37, a girl in my girl's class
21 was killed.

22 Q. What school do your children go to?

23 A. In the Nuns' School of Nazareth.

24 THE INTERPRETER: Interpreter's note. The
25 Nazareth School is in Haifa also.

1 F. KARKABI

2 Q. BY MR. MONSOUR: Okay. You state that,
3 when there is a terrorist action, these issues are
4 discussed in your children's school.

5 What do they tell the children about these
6 issues?

7 A. General things. They used to discuss
8 these things in a general aspect of it. I don't
9 remember exactly because it has been a while. But
10 I remember that they used to discuss simple things.

11 For example, they used to tell me poor
12 this person or raise questions like why these things
13 happen, why this person was killed. So simple
14 things like that where they raise questions.

15 Q. What would you tell them?

16 A. I used to tell them: May God have mercy
17 on their souls. And those people who do it are not
18 good people.

19 Q. When they asked you why these attacks were
20 committed, what would you tell them?

21 A. I didn't answer them. I used to stay
22 silent.

23 Q. What part of Haifa do you live in?

24 What's the neighborhood?

25 A. Now I live in Allenby Street. I used

1 F. KARKABI

2 to live at Yud Lamed Peretz Street in the area of
3 Hadar. But two months ago, I moved to Allenby.

4 Q. How long did you live in Hadar?

5 A. I lived for eight years in the Hadar.

6 Q. Have you ever heard of the neighborhood of
7 Halisa?

8 A. Yes.

9 Q. What's it like?

10 A. I heard about it but never been there.
11 Because if we don't have relatives, neither friends
12 in the area, we don't go.

13 Q. Have you ever heard of it referred to as
14 a ghetto?

15 A. No. I don't know something about this
16 thing.

17 Q. Is it considered a good neighborhood?

18 A. I don't know.

19 Q. Do mostly Arabs live there?

20 MR. EUBANKS: Objection. Foundation.

21 THE WITNESS: Also I don't know.

22 Q. BY MR. MONSOUR: Have you ever heard that
23 drug use is prevalent there?

24 A. No, I don't know about it.

25 Q. Have you ever heard that Arabs of Haifa

1 F. KARKABI

2 were forced to live in this neighborhood?

3 MR. EUBANKS: Objection. Foundation.

4 THE WITNESS: No. I don't know. Where
5 will I know from?

6 Q. BY MR. MONSOUR: Well, you live in Haifa,
7 don't you?

8 A. No, I don't know. Because I know
9 everything that is related to my direct sphere.
10 So I know everything directed to my relatives,
11 to my family, to my kids, where do they study,
12 my direct surroundings. Anything else outside
13 of that doesn't mean anything to me.

14 Q. So having lived your entire life in Haifa,
15 you don't know anything about the neighborhood in
16 Haifa called Halisa?

17 A. I know nothing about Halisa. If you want
18 to ask me, ask me about the Wadi Nisnas area.

19 Q. Do you know about the Wadi Nisnas area?

20 A. I lived there.

21 Q. You live there now?

22 A. I lived there.

23 Q. When did you live there?

24 A. I grew up in this neighborhood. Very
25 close to this neighborhood, there is a name of

1 F. KARKABI

2 Hatzinut. If I want to go to the market, I go
3 to Wadi Nisnas. If I want to buy something, I go
4 to Wadi Nisnas. Our church is also considered to
5 be within this area.

6 Q. Have you ever heard of this area referred
7 to as a ghetto?

8 A. No. I never heard something about that.

9 Q. Is this a location that mostly Arabs live
10 in?

11 A. No. There were Jews living in this area.
12 When my family lived there, the neighbors were Jews.

13 Q. Were you allowed permits to build houses
14 in this neighborhood?

15 A. I don't know something about this. I
16 don't know of someone who wanted to build or to
17 rechange a thing. I don't know. But I know there
18 is an engineer who comes and checks. And if they
19 want to expand something, for example, a balcony,
20 they will do it.

21 Q. Have you ever heard complaints by Arabs
22 that they are not allowed to build in that area?

23 A. Not even one time I heard about it.

24 Q. Ms. Karkabi, do you vote in elections?

25 A. Yes, I vote.

1 F. KARKABI

2 Q. Have you ever heard of the politician
3 Issam Mukhoul?

4 A. No.

5 Q. You've never heard of this person as an
6 Arab member of the Knesset?

7 A. In general, I don't watch TV for politics.
8 I only watch it for movies, cooking, something
9 related to the children.

10 Q. So you've never heard of Issam Mukhoul?

11 A. I heard of his name. But I don't know who
12 he is, where he is, what he is.

13 Q. Did you ever hear that he was a victim of
14 a bombing attack?

15 MR. EUBANKS: Objection. Foundation.

16 THE WITNESS: No, I didn't.

17 Q. BY MR. MONSOUR: You've never heard that
18 this Arab member of the Knesset had a car bomb
19 planted in his car by a Jewish terrorist?

20 MR. EUBANKS: Objection. Foundation.

21 THE WITNESS: Could you please repeat the
22 question?

23 Q. BY MR. MONSOUR: Sure. You have never
24 heard that this Arab member of the Knesset had a car
25 bomb planted in his car by a Jewish terrorist?

1 F. KARKABI

2 MR. EUBANKS: Objection. Foundation.

3 THE WITNESS: No, I didn't. I'm sorry.

4 Q. BY MR. MONSOUR: Have you ever eaten at
5 the Shawarma Hazen restaurant in Haifa?

6 A. Yes. Sure. The Hazen Shawarma used to be
7 in the area where I lived, where my parents live.

8 Q. Did you ever hear about an IDF soldier
9 committing a shooting attack on that restaurant?

10 A. I know the Hazen Shawarma when it was
11 a small place. But when it became like a larger
12 place, a bigger place, I don't know about these
13 things.

14 Q. You've never heard there was an attack on
15 the restaurant?

16 MR. EUBANKS: Objection. Foundation.

17 THE WITNESS: The Hazen used to be a small
18 place. But then they expanded, and other people
19 took the name of the Hazen. So what you're talking
20 about, I don't know anything about.

21 Q. BY MR. MONSOUR: Okay. Just so we're
22 clear, no one that you know living in Haifa ever
23 talked to you about a shooting attack on this
24 popular restaurant?

25 MR. EUBANKS: Objection. Foundation.

1 F. KARKABI

2 And I would ask that you stop harassing
3 the client.

4 THE WITNESS: This, what you talk about
5 doesn't mean anything. I mean, I sit with women
6 like me. We cook. We talk about cooking, about
7 kids, about women-related stuff.

8 But what you're talking about doesn't add
9 or take away something from the whole discussion.
10 Even when I sit with my family, we don't discuss
11 these things. We discuss general things. We say
12 jokes. We smoke. We discuss. That's it.

13 Q. BY MR. MONSOUR: Do you ever talk about
14 terrorist attacks that happen in Israel at all?

15 A. It's not enough to talk about the
16 terrorism operation that included my brother. We
17 all discuss it. I talk about it also with my family
18 and my kids, my children.

19 Q. What about attacks that have happened
20 since that time?

21 A. Do you mean the explosions that happened
22 also?

23 Q. Any attacks, including explosions.

24 A. You mean in general?

25 Q. In general.

1 F. KARKABI

2 A. In general, we don't talk much except
3 about the incident that included my brother with my
4 kids because it's their uncle. I cry. They saw me
5 crying, their grandmother crying. Their father is
6 crying. Everybody is crying. So this is the most
7 topic that we talk about. They were surrounded by
8 tears, by a black picture. This is what they saw
9 for real on the ground.

10 Q. You stated that your kids do talk about
11 terrorist attacks in general at school; correct?

12 A. It's not like they discuss it on a daily
13 basis. But when it coincides with a bombing that
14 involves a kid from the school or other person, then
15 of course they discuss it.

16 Q. Ms. Karkabi, having lived your whole life
17 in Haifa, in Israel, what do you think motivates the
18 attacks between Palestinians and Israelis?

19 MR. EUBANKS: Object to form.

20 THE WITNESS: Don't ask me. Go and ask
21 them why do they do it. They kill people, people
22 who work. So go and ask them, not me.

23 Q. BY MR. MONSOUR: Do Israelis ever kill
24 innocent Palestinians?

25 MR. EUBANKS: Object to form.

1 F. KARKABI

2 THE WITNESS: Ask them. If you want, go
3 and ask them. Don't ask me.

4 Q. BY MR. MONSOUR: I'm asking you if you're
5 aware of this.

6 A. No, I don't. I don't live with them.

7 Q. And do you consider yourself to be
8 Palestinian?

9 A. Yes.

10 Q. Do you ever feel like you're discriminated
11 against in this country?

12 A. No. Not at all. Not at all.

13 Q. How about your children?

14 A. What do you mean?

15 Q. Well, do they ever feel like they're
16 discriminated against?

17 A. Not at all. Not at all. Not at all.

18 My daughter, for example, now sent her
19 resume out through the Internet to different jobs.
20 And she takes the examination that is required. So
21 if they tell her no, it's no. So it's exactly like
22 a Jewish person does. So there is no discrimination
23 when it comes to this.

24 Q. Are there government jobs that Israeli
25 Arabs can't obtain that Jewish people can?

1 F. KARKABI

2 MR. EUBANKS: Objection. Foundation.

3 THE WITNESS: No. No. Not at all.

4 Q. BY MR. MONSOUR: Can Arab Israelis
5 purchase any land they want from the State of
6 Israel?

7 MR. EUBANKS: Objection. Foundation.

8 THE WITNESS: I don't know about this.

9 Q. BY MR. MONSOUR: Could you buy land in a
10 kibbutz if you wanted to?

11 MR. EUBANKS: Objection. Foundation.

12 THE WITNESS: I don't know. I didn't even
13 try. I didn't try. So there are things that I
14 don't know about.

15 Q. BY MR. MONSOUR: Could you buy land in a
16 moshav if you wanted to?

17 MR. EUBANKS: Objection. Foundation.

18 THE WITNESS: I don't know if they will
19 approve it or not. I cannot tell you.

20 Q. BY MR. MONSOUR: Well, if they wouldn't
21 approve an Arab buying this land but they would
22 approve a Jewish person, isn't this discrimination?

23 MR. EUBANKS: Object to form.

24 THE WITNESS: What can I tell you? I
25 don't know even about this. I don't know if they

1 F. KARKABI

2 actually sell.

3 Q. BY MR. MONSOUR: Sell land?

4 A. Yes. I don't know if there is something
5 like this.

6 Q. Well, would you consider this to be
7 discrimination?

8 A. Look, if I looked from above on the
9 situation, I should also know the reasons why they
10 would sell a Jew and not an Arab. So it's like
11 looking from above from a theater and see it. I
12 should also know the reasons and then be able to
13 judge.

14 Q. What would those reasons be?

15 A. I can't tell you. I don't know. Each has
16 his own reasons.

17 Q. Have you ever heard complaints from Arabs
18 that their school system is not as well funded as
19 the Jewish school system?

20 A. No. On the contrary. I heard that there
21 is no discrimination.

22 For example, I will give you. My
23 daughter, in her graduation, the mayor gave 30
24 computers to the school. It's the same between
25 Jewish and Arab schools. No discrimination.

1 F. KARKABI

2 I'm talking about this, and my kids are
3 in a private school. They're not even in a public
4 school that takes more, according to what I know.

5 In the private school, we give the school
6 money, for example, to have air conditioning in
7 the classroom. But in the public school, there
8 is already air conditioning installed.

9 Lately, the nuns' school, Nazareth Nuns'
10 School, they applied -- according to the building
11 issue that you asked me before, they applied to make
12 the school larger. And the municipality approved
13 their request.

14 Q. Where is this school located?

15 A. In Haifa on Haba Street.

16 Q. Do Arab Israelis have the same military
17 service as Jewish Israelis?

18 A. He who loves (sic). There are also many
19 who do the civil service.

20 Q. But in answer to my question: Do Arab
21 Israelis have the same military service as Jewish
22 Israelis?

23 A. No, they don't have to. They're not
24 obligated.

25 Q. And why not?

1 F. KARKABI

2 A. It depends on the sect, for example, with
3 the patriarchy or the priest. In our own sect, they
4 don't allow us. Like it's the same for the Muslims,
5 also for the sheik. Also for the Druze, many don't
6 approve it. So it actually depends on who is
7 heading that sect.

8 Q. Would the Israeli military require Arabs
9 to serve in the military as they do Jewish citizens?

10 MR. EUBANKS: Objection. Asked and
11 answered.

12 THE WITNESS: I don't know.

13 Q. BY MR. MONSOUR: And does this create a
14 significant distinction between Arabs and Israelis?

15 A. No. This is not related. Like in Haifa,
16 we live together, and there's no one better than us.
17 We care for each other.

18 Like in the last war with Lebanon in 2006,
19 they even asked us to join them in the shelter
20 because we didn't have one. They called to check on
21 us three times when the incident happened that three
22 rockets fell meters -- a few meters away from where
23 I live in the Wadi Nisnas area. They would tell me
24 on the phone: Leave what you have and come to us.

25 Q. Have any of your children served in the

1 F. KARKABI

2 military?

3 A. They're still young.

4 Q. All of them?

5 A. What all of them? The eldest is 19 and
6 a half, as I said. And the second one, who just
7 graduated, 18. So whoever wants to go to the Army
8 will not go before 18 years old.

9 Q. Is your 18-year-old and your 19-year-old
10 currently in the military?

11 A. They didn't think about this. They only
12 thought about continuing their studies.

13 Q. Have any of your siblings served in the
14 military?

15 A. No.

16 Q. Are there certain jobs that you cannot
17 obtain without serving in the military?

18 MR. EUBANKS: Objection. Foundation.

19 THE WITNESS: Sure.

20 Q. BY MR. MONSOUR: So does this create a
21 problem for Arabs trying to get these jobs if they
22 don't serve in the military?

23 A. That has to do with the job itself. For
24 example, there are many Arabs that actually have a
25 governmental job. But, for example, a security

1 F. KARKABI

2 guard job requires that this person did his military
3 service. So there are jobs that Arabs actually have
4 and are able to obtain.

5 Q. So just so I'm clear, is there not a job
6 that an Arab cannot get without serving in the
7 military?

8 MR. EUBANKS: Objection. Asked and
9 answered.

10 THE WITNESS: I didn't understand the
11 question. Do you mean that there are jobs that
12 Arabs can't perform because they haven't served
13 in the Army?

14 Q. BY MR. MONSOUR: I mean, are there jobs
15 that would not allow an Arab to have that mode of
16 employment because they did not serve in the
17 military?

18 THE INTERPRETER: I don't understand. I
19 personally don't understand. What do you mean "that
20 mode of employment"?

21 (Brief discussion in Arabic between the
22 two interpreters.)

23 (Pending question translated.)

24 THE WITNESS: No. And I told you before,
25 there are certain governmental jobs where Arabs are

1 F. KARKABI

2 actually in charge and they're like the bosses. And
3 they give orders to their Jewish employees.

4 There is nothing here like Arabs and Jews.
5 If you work and you do what you have to do, then you
6 are fine.

7 Q. BY MR. MONSOUR: Okay. Just so I'm clear,
8 when I asked you before, are there certain jobs that
9 you cannot obtain without serving in the military,
10 you said yes.

11 What were you referring to?

12 A. I told you I was referring to the security
13 guard job. Because a security guard will actually
14 carry a weapon.

15 Q. Have you ever seen any job advertisements
16 in the newspaper that say "military service
17 required"?

18 A. No. No. Because also my daughter, she
19 goes and opens and clicks and checks. And she never
20 actually saw something like this.

21 Q. Were there demonstrations in Haifa in the
22 early 2000s?

23 A. I don't even remember what I ate
24 yesterday. So you are asking me something about
25 what happened in 2000. No, I don't remember.

1 F. KARKABI

2 Q. You don't remember big demonstrations
3 going on in the streets of Haifa where you lived in
4 the year 2000, 2001?

5 MR. EUBANKS: Objection. Foundation.

6 THE WITNESS: I saw demos of Jews and
7 Arabs demonstrating for peace. But other kinds
8 of demos, I didn't see.

9 Q. BY MR. MONSOUR: Did you ever hear that
10 people were killed in those demonstrations?

11 MR. EUBANKS: Objection. Foundation.

12 THE WITNESS: No. Demos asking for peace
13 go and die? What's the story here?

14 Q. BY MR. MONSOUR: Okay. How were the
15 demonstrations carried out to your recollection?

16 A. I used to see them asking for peace.

17 THE INTERPRETER: Well, she didn't say
18 "advertisements," but I think it's "banners."

19 THE WITNESS: I used to see them carrying
20 those banners, asking for peace. But that's it.

21 Q. BY MR. MONSOUR: Have you ever been to the
22 West Bank?

23 MR. EUBANKS: Objection. Foundation.

24 THE WITNESS: I used to go to Jenin.

25 Q. BY MR. MONSOUR: What was that like?

1 F. KARKABI

2 A. I used to go and shop from there.

3 Q. When was this?

4 A. Before. I moved to my house before nine
5 years. I went to Jenin to buy what I needed to fix
6 in the house.

7 Q. So this was nine years ago?

8 A. Before nine years ago.

9 Q. What's Jenin like now?

10 A. When I go there, I'll tell you.

11 Q. You haven't been there since?

12 A. No. Since the second Intifada, I didn't
13 visit it.

14 Q. Do you have any family that lives there?

15 A. No.

16 Q. What do you think of the building of
17 settlements in the West Bank?

18 MR. EUBANKS: Objection. Foundation.

19 THE WITNESS: I don't know. I'm not able
20 to answer this question.

21 Q. BY MR. MONSOUR: Why are you not able to
22 answer this question?

23 A. Because I don't know nothing about them.
24 Because I don't know that they are even building
25 settlements there.

1 F. KARKABI

2 Q. Have you ever heard of settlements in the
3 West Bank?

4 A. No, I didn't hear about it.

5 Q. Okay. Are you aware of whether there are
6 settlements in the West Bank?

7 A. No, I don't. That's why I said I don't
8 know. And I cannot answer a question that I don't
9 know the answer for.

10 Q. Have you ever heard of anyone talking
11 about settlements being built in the West Bank?

12 A. I said before that, when we sit and talk,
13 we don't discuss these things.

14 Q. Have you ever seen it on the TV?

15 A. No, even that. On TV I only see movies,
16 or I see other children's things with my daughter.
17 When my husband watches TV, I used to be standing
18 in the kitchen.

19 Q. Have you ever read about settlements in a
20 newspaper?

21 A. No. I don't have time for these things.

22 Q. Have you ever heard that the building of
23 settlements in the West Bank motivates violence on
24 the part of Palestinians?

25 MR. EUBANKS: Objection. Foundation.

1 F. KARKABI

2 THE WITNESS: If I basically don't know
3 anything about settlements or never heard about it,
4 how am I able to answer your question?

5 Q. BY MR. MONSOUR: Okay. Do you think the
6 West Bank land should be a part of Israel, or should
7 it belong to the Palestinians that live there?

8 MR. EUBANKS: Object to form.

9 THE WITNESS: For both.

10 Q. BY MR. MONSOUR: What do you mean?

11 A. I mean for both, that both of us will
12 actually live on it together, when there will be
13 peace.

14 Q. So do you believe that the West Bank
15 should be a part of Israel?

16 A. I don't know how, but I want us to both
17 live together in harmony. That's what I know.

18 Q. What do you think it would take for there
19 to be peace between Palestinians and Israelis?

20 MR. EUBANKS: Objection.

21 THE WITNESS: Love.

22 Q. BY MR. MONSOUR: Do you think there's any
23 certain actions that should be taken on the part
24 of Israelis to ensure peace between them and the
25 Palestinians?

1 F. KARKABI

2 MR. EUBANKS: Objection.

3 THE WITNESS: I don't know what they have
4 to do. I only know that there should be peace.

5 Q. BY MR. MONSOUR: Do you think that both
6 Palestinians and Israelis are at fault for there not
7 being peace?

8 MR. EUBANKS: Objection. Foundation.

9 THE WITNESS: I don't know. What is this
10 question? I don't understand it.

11 Q. BY MR. MONSOUR: Well, do you think only
12 the Palestinians are at fault for there not being
13 peace between Israelis and Palestinians?

14 MR. EUBANKS: Objection.

15 THE WITNESS: According to my opinion,
16 it's both.

17 Q. BY MR. MONSOUR: What do you think are
18 some of the things Israel does that puts it at fault
19 as well as the Palestinians?

20 A. I don't know.

21 Q. Ms. Karkabi, why are you suing Arab Bank?

22 A. It came here to commit terrorism for
23 bombing.

24 THE INTERPRETER: Can you please repeat
25 it? Sorry, I forgot.

1 F. KARKABI

2 (Brief discussion in Arabic between the
3 interpreter and the witness.)

4 THE WITNESS: It bombed itself. It killed
5 my brother. What do you think? Of course, I will
6 have to accuse it.

7 Q. BY MR. MONSOUR: So just so we're clear,
8 you think the bank came here to commit terrorism for
9 bombing?

10 A. The bank sent its hand or even sent a
11 finger.

12 Q. So what do you mean exactly?
13 What do you think the bank did in
14 connection to the bombing that killed your brother?

15 A. When the bank helped these people, this
16 person who helped, who said, "I'll go and do it,"
17 killed these people who work, it's either they
18 came or it came.

19 THE INTERPRETER: As in reference to the
20 bank. That's my note.

21 Q. BY MR. MONSOUR: How do you think the bank
22 helped in this?

23 A. When it sponsors them, when it funds them,
24 when it helps their parents, when it helps their
25 children and sponsors them as well to live.

1 F. KARKABI

2 Q. Are you aware of any facts in support of
3 this belief that Arab Bank did this?

4 A. Ask my lawyer.

5 Q. I'm asking if you yourself are aware of
6 any facts?

7 A. I have a lawyer, and my lawyer can answer
8 your question.

9 Q. How did you find out about this lawsuit?

10 A. I don't remember how they came to me.

11 Q. Who came to you?

12 A. They didn't come to me. They came to my
13 family.

14 Q. Who's the "they"?

15 A. I don't know.

16 Q. Was it a lawyer?

17 A. I don't know.

18 Q. When you say they came to your family,
19 what do you mean?

20 A. I recently found out about this. My
21 father told me about this recently.

22 Q. How recently?

23 A. Three to four months ago, something like
24 that.

25 Q. When did you find out that you were a part

1 F. KARKABI

2 of this lawsuit?

3 A. When they came and told me that I need to
4 come here and talk.

5 Q. When was that?

6 A. Before three or four months.

7 Q. Do you know when you were officially made
8 a member of this lawsuit?

9 A. Could you please repeat the question?

10 Q. Sure. You stated that you found out that
11 you were a member of this lawsuit three or four
12 months ago when you were told about this proceeding.

13 But do you know when you were officially
14 made a member of this lawsuit?

15 A. What do you mean when did I know?

16 I cannot really understand the question.
17 I'm really sorry. I'm tired a bit.

18 Can I go to the bathroom?

19 Q. Sure. Let's take a break.

20 (Recess from 2:55 p.m. to 3:05 p.m.)

21 Q. BY MR. MONSOUR: All right. Back on the
22 record.

23 Do you remember at any point in time,
24 Ms. Karkabi, filling out forms to join this lawsuit?

25 A. In brief, my parents were in charge, and

1 F. KARKABI

2 they took care of it. They wrote down their names,
3 and then they called me.

4 Q. Whose names did they write down?

5 A. Me and my brothers.

6 Q. Okay. And what did they write these names
7 down on?

8 A. On a paper.

9 What do you mean?

10 Q. Are these forms that they filled out for
11 this lawsuit?

12 Is that what you're referring to?

13 A. I don't know. When they visited my
14 family, I didn't see what kind of forms they filled
15 it on.

16 THE INTERPRETER: Interpreter's comment.
17 She used the word "tofis" as "form" in Hebrew.

18 Q. BY MR. MONSOUR: Do you know when this was
19 that your father put your name on this form?

20 A. My mom told me that after my brother
21 passed away, maybe between six months and a year.
22 Even her, she doesn't remember.

23 Q. When was the first time that you met with
24 an attorney with respect to this lawsuit?

25 A. Maybe before three or four months with

1 F. KARKABI

2 those who were sent by the office. It was Keren and
3 Ram.

4 Q. So that was -- when you say before three
5 months ago, do you mean within a three-month range?

6 Or how much more than three or four months
7 ago are we talking about?

8 A. No, not more than that. Even maybe less.
9 But not more than three or four months. I cannot
10 really remember.

11 Q. Okay. After that meeting, when was the
12 next time that you met in person with an attorney
13 with respect to this case?

14 A. Today.

15 Q. Prior to this proceeding?

16 A. What do you mean by "this proceeding"?

17 Q. You mean today before this proceeding?

18 A. Before we just sat for this session, you
19 mean?

20 Q. Yes.

21 A. I saw Mr. John.

22 Q. At any point in time, did your attorneys
23 provide you with any facts in support of your
24 lawsuit against Arab Bank?

25 A. Can you personally repeat that question?

1 F. KARKABI

2 Q. At any point in time, did your attorneys
3 provide you with any facts in support of your
4 lawsuit against Arab Bank?

5 A. I don't remember this thing.

6 Q. You don't what?

7 A. I don't remember this thing.

8 Q. You stated earlier that you were not aware
9 of any facts in support of the claims that you're
10 making against Arab Bank; is that correct?

11 A. I said he can ask my lawyer. Isn't that
12 right?

13 Q. By saying that, do you mean that you
14 yourself are not aware of any facts?

15 A. No. What I know -- all what I know is
16 from my husband and also from my parents. By that,
17 I mean my father and my mother. So I asked them,
18 and that's it.

19 THE INTERPRETER: I'm sorry. I have to
20 complement the answer.

21 THE WITNESS: They told me that they have
22 signed this form and they have wrote our names. So
23 I went to my husband, and I asked him to explain to
24 me what these forms mean.

25 Q. BY MR. MONSOUR: What did your husband

1 F. KARKABI

2 tell you?

3 A. He told me that he visited the Internet
4 and he checked on the Arab Bank. And it was
5 sponsored by Saudi Arabia and that it supports
6 terrorism.

7 Q. What else did he tell you?

8 A. That's it. I didn't ask him for him to
9 explain it.

10 Q. Did you read these articles?

11 A. No.

12 Q. Have you ever heard about Arab Bank on the
13 TV?

14 A. I previously told you I don't watch TV.

15 Q. Have you ever read about Arab Bank in the
16 paper?

17 A. My husband did read about it.

18 Q. Do you know where he read about it?

19 A. Whatever was available, he read it.

20 Q. Did he read about this after learning
21 about the lawsuit or before?

22 A. According to what he told me, that he
23 only heard about it and read about it. But he never
24 actually presented or brought this issue in front of
25 me. But only when I asked him specifically about

1 F. KARKABI

2 it, he told me a bit. And he told me from what he
3 read on the Internet as well.

4 Q. Have you ever had an account with Arab
5 Bank?

6 A. No. Not even one time. I have a bank
7 account in Bank Hapoalim.

8 Q. Do you know of any family members that
9 have accounts at Arab Bank?

10 A. How would I know?

11 Q. Did they tell you?

12 A. It's a private thing related to them.
13 They're not supposed to tell me, and I don't ask
14 them.

15 Q. Are you aware of any friends of yours that
16 have bank accounts at Arab Bank?

17 A. Same. These things are personal. I
18 cannot come and ask about personal things.

19 Q. Do you know where Arab Bank has branches?

20 A. I know that it's in the United States.
21 I know that from my husband. Other things about
22 branches, I don't know.

23 Q. Do you know if it has a branch here in
24 Israel?

25 A. I don't know. I don't know.

1 F. KARKABI

2 Q. Do you know where the bank is based out
3 of?

4 A. You ask me strange things. I don't
5 understand. I don't know.

6 Q. Okay. Have you ever heard of it referred
7 to as a Jordanian bank?

8 A. No, I didn't hear about it. And I don't
9 know about it.

10 Q. Are you suing anyone else besides the Arab
11 Bank?

12 A. No.

13 Q. Ms. Karkabi, did you ever speak to the
14 police or the military about the attack that killed
15 your brother?

16 A. I talked to the police. When the
17 explosion happened and we heard about it, we went
18 to the hospital to see. They started moving us from
19 one place to another until the police came and asked
20 about the last person that saw him. And I answered
21 it's me. I answered him about what he was wearing
22 and the color of it and where we were standing. So
23 then I included and I kind of summarized what I said
24 and I signed.

25 Q. So you gave this statement to the police

1 F. KARKABI

2 officer?

3 A. Exactly.

4 Q. Did the police or military ever give you
5 any information about the attack itself?

6 A. No.

7 Q. Okay.

8 A. While we were in the hospital, not at all.

9 Q. How about after the hospital?

10 A. After we have been to the hospital, what
11 was on TV. And you heard. We also heard.

12 Q. Okay. Apart from that, did you ever have
13 any conversations with the police or the military?

14 A. No. Not at all.

15 Q. Are you aware if any persons were captured
16 in connection to this attack?

17 A. I know that there was information about
18 the cab driver who actually gave her a lift.

19 Q. Do you know what happened to him?

20 A. He was sentenced. But for how long, I
21 don't know.

22 Q. And did you attend his trial or his
23 sentencing?

24 A. No, I wasn't. Because that place was too
25 far and there was nobody to go to. So we actually

1 F. KARKABI

2 followed this on TV.

3 Q. When you say "we," do you mean your
4 family?

5 A. I mean myself, my husband, and my
6 children.

7 Q. Do you know if any other members of your
8 family attended the trial or the sentencing?

9 A. In reality, in the family -- nobody
10 actually went there because we couldn't actually
11 go there. Although my father has a car, but we
12 didn't know the roads there. So we didn't go.

13 Q. Do you know where the trial or the
14 sentencing was held?

15 A. Roughly. I don't know. But in an area
16 very close to Jenin. I don't know exactly.

17 Q. Okay. Was the trial or sentencing in the
18 West Bank?

19 A. In this area.

20 Q. Jenin?

21 A. I didn't say Jenin. In an area close to
22 Jenin.

23 Q. Well, did you mean an area, as you say,
24 very close to Jenin that's not in the West Bank?

25 Or do you just not know if it was in the

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2 West Bank or not?

3 A. I don't know. An area that isn't under
4 Palestinian -- in an area that doesn't fall under
5 the Palestinian Authority. It's an area within
6 Israel.

7 Q. Ms. Karkabi, tell me what you know about
8 the incident, the attack itself.

9 A. It was a Saturday. And, in general,
10 we don't work on a Saturday. It was morning, at
11 9:00 a.m. I went to Wadi Nisnas to buy stuff. And
12 we saw my brother. Then he went to his work, and we
13 continued. And then I went back home.

14 THE INTERPRETER: She also said his name,
15 "Mutanus."

16 THE WITNESS: I started working. This was
17 something unusual. My husband usually listens to
18 the news and watches TV. But this time, he wasn't
19 doing that. He was playing with my son.

20 All of a sudden, the door rang, and his
21 sister came in, my husband's sister. And she asked
22 us: Why aren't you watching the TV? There was an
23 explosion.

24 THE INTERPRETER: She said in Hebrew
25 "pigua."

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2 THE WITNESS: And we asked her: Where was
3 that?

4 And she answered that there was an
5 explosion at Maxim restaurant. Immediately his
6 brother came in. He came back from a visit to the
7 graveyard. He went there to visit the graveyard
8 with some of our relatives. And he came and
9 whispered in my husband's ear and told him: I
10 saw him lying on the ground.

11 I didn't hear that. So my husband told
12 me: You have to hold yourself. Something really
13 bad happened.

14 And we went to the hospital. We were
15 moving from one room to another. We were moving
16 from one floor to another until we saw the
17 policeman. And he asked me. My mother fainted,
18 and she fell on the ground.

19 After all this mess and once things calmed
20 down a bit, they came and told us: Three of you
21 have to go to Abu Kabir to recognize the body.

22 My husband and my older brother Milad and
23 someone else -- I can't remember who it was -- went
24 and recognized my brother.

25 This is what happened. He went in a

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2 glimpse of an eye.

3 Q. BY MR. MONSOUR: Did you ever speak to
4 anyone that was present during the incident of the
5 bombing?

6 A. What do you mean during the bombing?

7 I wasn't present during the bombing in the
8 restaurant.

9 Q. Did you ever speak to anyone after the
10 bombing that was present during the incident?

11 A. Can I ask a question to know how to answer
12 it?

13 Does it mean that I talked to someone
14 instantly after I heard about the explosion?

15 Q. At any point after the incident.

16 A. I called my parents. I called his wife.
17 I asked her: Would you like to come with us to the
18 hospital?

19 She said: No. My brother is coming, and
20 he will take me.

21 I didn't talk to anybody. I didn't even
22 care for my children. I went as I was with my
23 slippers, with the way I was dressed, straight to
24 the hospital to see my brother, to see something
25 from him.

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2 Q. Did there ever come a point in time when
3 you spoke to someone who had been present in the
4 restaurant during the time of the bombing?

5 A. No. No.

6 (Ms. Readlinger exits the proceedings.)

7 Q. BY MR. MONSOUR: Okay. How long had your
8 brother worked at the restaurant?

9 A. I don't know for how long.

10 Q. What was his job?

11 (Brief discussion in Arabic between the
12 interpreter and the witness.)

13 THE INTERPRETER: She's asking about a
14 word in Hebrew that she's using.

15 To tell her?

16 MR. MONSOUR: Yeah. Go ahead and help
17 her.

18 (Brief discussion in Arabic between the
19 interpreter and the witness.)

20 THE WITNESS: He used to work in so many
21 subjects. He used to fix things. He used to work
22 as an electrician. It doesn't mean that he didn't
23 study anything. He studied as an insurance agent.
24 And he worked in that field also.

25 But he worked in anything that could help

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2 his family, to support his family. That's why he
3 worked as a security guard, because his wife wasn't
4 working.

5 Q. BY MR. MONSOUR: Okay. Just so we're
6 clear, he worked as a security guard for the
7 restaurant?

8 A. Yes.

9 Q. What did your family do after your time
10 at the hospital?

11 A. Normal. As any other family that opens
12 its house for condolences.

13 Q. Do you know if the restaurant was ever
14 rebuilt after this incident?

15 A. Surely it was rebuilt. They fixed it, and
16 now it's working again.

17 Q. Have you been there since?

18 A. I don't even like to pass by this area.
19 The first time I went there and the only one is when
20 they put the memorial stone there. And this was the
21 only time that I stand by it.

22 Q. When was this?

23 A. Before two to two years and a half because
24 they recently rebuilt it not long ago.

25 Q. Ms. Karkabi, did you ever file a claim

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2 with Bituach Leumi in connection to this incident?

3 A. No, I didn't. I never filed something to
4 the National Insurance. What can it help me, the
5 National Insurance?

6 Q. Okay. Did you ever receive any sort of
7 psychological treatment?

8 A. No. No. Because any psychological
9 treatment involves that the doctor will come and sit
10 with me. And this will make me much more tired. I
11 have people at home, people who I can talk to.

12 Q. I've read that this restaurant was
13 well-known for both Jews and Arabs frequenting it
14 together; is that true?

15 A. Correct.

16 Q. I've also heard that's true of Haifa as
17 well; is that true?

18 A. Correct.

19 Q. Is Haifa unique in this respect compared
20 to other parts of Israel?

21 MR. EUBANKS: Objection. Foundation.

22 THE WITNESS: In what aspect?

23 Q. BY MR. MONSOUR: Do Jews and Arabs live
24 together more peacefully than in other parts of
25 Israel?

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2 A. According to what I hear, that in Haifa
3 Arabs and Jews coexist in a very big peaceful way.

4 Q. More so than in other parts of Israel?

5 MR. EUBANKS: Objection. Foundation.

6 THE WITNESS: As I previously told you,
7 Haifa is the city where the biggest peaceful
8 coexistence happened between Arabs and Jews.

9 Q. BY MR. MONSOUR: Why do you think that's
10 true of Haifa?

11 A. This is related to the people that live in
12 Haifa, to the population of it.

13 Q. Why are Israelis and Palestinians not able
14 to get along as well in other parts of Israel as
15 Haifa?

16 MR. EUBANKS: Objection. Foundation.

17 THE WITNESS: Go and ask them. You're
18 asking me?

19 Q. BY MR. MONSOUR: I'm asking your opinion.

20 A. The same. I don't know.

21 Q. Have you ever learned any information
22 about the bomber who committed the attack that
23 killed your brother?

24 A. I know that she's a girl. This is what
25 was told to me because I don't read the newspaper.

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2 She's a girl, and she is a beautiful girl. This is
3 what was told to me.

4 Q. Have you ever heard of any information as
5 to what motivated her to commit this attack?

6 A. No.

7 Q. Do you believe that the families of
8 suicide bombers should be punished if they didn't
9 know anything about the attack that was going to
10 be committed?

11 A. Do you mean that they supposedly should
12 punish her family?

13 Q. Should her family be punished if they did
14 not know she was going to commit this crime?

15 A. No.

16 Q. Are you aware of Israel's policy of
17 destroying the homes of the families of suicide
18 bombers?

19 MR. EUBANKS: Objection. Foundation.

20 THE WITNESS: No, I don't know.

21 Q. BY MR. MONSOUR: Have you ever heard of
22 that?

23 A. No.

24 Q. Do you think a suicide bomber's family
25 should still be able to receive charity if they

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2 did not know about the attack that was going to be
3 committed?

4 MR. EUBANKS: Object to form.

5 THE WITNESS: No, they shouldn't help it.
6 They shouldn't receive it.

7 Q. BY MR. MONSOUR: Why not? Why not?

8 A. Why to help them? What's the reason?

9 Q. Well, if the family needs charity and they
10 had nothing to do with the crime, should they still
11 be able to receive the charity?

12 MR. EUBANKS: Object to form.

13 THE WITNESS: In general, if the family is
14 poor and in need, why not? They can help them if
15 that has to do only with help.

16 But I don't think that nobody of them
17 know --

18 THE INTERPRETER: Referring to the
19 families. That's my note.

20 THE WITNESS: -- know about the incident.
21 I think they actually know about it.

22 Q. BY MR. MONSOUR: Did you ever hear or
23 learn that the family of the suicide bomber that
24 caused your brother's death had no idea that she
25 was going to commit this crime?

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2 MR. EUBANKS: Objection. Foundation.

3 THE WITNESS: I don't know information.
4 I don't know more information except for the ones
5 that I already talked about right now.

6 Despite this, my heart is burning. It's
7 like she killed my brother. Do you expect me to
8 tell you that you should go and help them?

9 Q. BY MR. MONSOUR: Ms. Karkabi, without
10 speaking directly about the bomber that caused your
11 brother's death, in general, do you think that
12 Israel should destroy the homes of the families
13 of suicide bombers?

14 MR. EUBANKS: Object to form.

15 THE WITNESS: Did Israel do this thing?

16 Q. BY MR. MONSOUR: Are you aware of it ever
17 having been done?

18 MR. EUBANKS: Objection. Asked and
19 answered.

20 THE WITNESS: Can I answer?

21 MR. EUBANKS: Yes.

22 THE WITNESS: Could you repeat the
23 question, please?

24 Q. BY MR. MONSOUR: Without speaking about
25 the bomber that caused your brother's death, in

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2 general, do you think that Israel should destroy
3 the homes of suicide bombers?

4 MR. EUBANKS: Object to form.

5 THE WITNESS: No. I'm not in support of
6 this. I cannot blame her family for this.

7 When she killed my brother, she also
8 killed herself. Not only that, she was cut into
9 pieces too. So if she killed -- like, I don't agree
10 with her killing my brother, I don't agree that they
11 actually demolish the house of her family.

12 Q. BY MR. MONSOUR: Ms. Karkabi, to the best
13 that you can, can you tell me the effects that your
14 brother's death has had on your family?

15 A. Many things. Several things. My mom got
16 sick. She wore black, and she didn't take it off
17 until only a month ago when my daughter got engaged.

18 My mom was in good health. She was never
19 in need to go to a doctor. She used to get regular
20 illnesses like to be sick or with flu and to take
21 medicine for it.

22 But after that, what happened, she started
23 to have a pressure in a way that went on her skin.
24 And she started taking medicine for it, and she went
25 to the hospital. And until now, she cannot even

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2 wear short sleeves. She would only have to wear
3 long sleeves.

4 It always has been only about crying. She
5 put a picture that big (indicating) in the room so
6 she will enter and exit crying. What do you expect
7 my father to feel like while seeing her wearing
8 black and constantly crying?

9 I will talk now about myself. I still
10 don't sleep well. I actually have dreams that I'm
11 suffocated. And also sometimes I dream about my
12 brother.

13 THE INTERPRETER: Can I just ask her a
14 question, please?

15 (Brief discussion in Arabic between the
16 interpreter and the witness.)

17 THE WITNESS: I even went very far with
18 this thing that happened to me. And I left my
19 family and my husband to start this work only to
20 actually forget what happened.

21 And I cannot still forget it. Even the
22 little song that I hear, the small part that I see,
23 always the tears on my face. And I cannot forget.
24 I am not able to forget.

25 I wore black for almost a year long.

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2 I wore black for a whole year. I didn't care for
3 myself. I didn't give my husband what I, as a wife,
4 should give to her husband. I didn't go out. I
5 always cried. I wasn't like any other woman. I
6 didn't care for myself. I didn't take care of
7 myself. I left my hair. I left my appearance.

8 I didn't take my children to refresh.
9 I didn't go or fly with them abroad. I didn't take
10 them to the pool. Even my youngest child, five
11 years old -- no -- three years old, I didn't even
12 take her to a garden.

13 I was a very nervous person. I was very
14 nervous. I wasn't there for my children. A mother
15 wasn't there. I wasn't there with them like I used
16 to be as a young child, sitting with them on the
17 swing, playing with them.

18 I no longer went to church. Why would I
19 go to church? Why? I stopped believing in God.
20 Why? Because I asked myself: Why was he asleep
21 when the whole explosion happened?

22 THE INTERPRETER: And she said the word
23 "explosion" in Hebrew, "pigua."

24 THE WITNESS: I never went back to the
25 church. I no longer loved going there. I only went

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2 there with my child. I stayed outside in the yard,
3 and I left her to go in, just to be with her.

4 She always asked me: Why aren't you
5 coming with me to take bread like families with
6 their children?

7 Continuously I am grieving. My husband --
8 my husband and I suffered for a whole year. He took
9 me to Taba just for refreshment. We went for four,
10 five days just to forget, just to get out of all
11 this mess.

12 I used to see him everywhere. And once we
13 came back, I couldn't stay in the house because I
14 saw him everywhere. That's why we sold the house
15 and we are living in rent. I'm paying for rent for
16 the new house. But this is not helping. Because I
17 still see my brother. And when I'm in pain, I say
18 "ach."

19 THE INTERPRETER: In Arabic, "ach," it
20 means "brother." And it's also the expression that
21 you give when you are in pain. So if you are hit
22 with something, you say "ach."

23 THE WITNESS: And my brother died when
24 my little child was three years old. My youngest
25 child, I left her. For more than three weeks, we

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2 were in grief. I was at my parents' house. And
3 when I came back, she asked me: Are you my mother?

4 I left my children. I left my husband.
5 And she asked me: Are you my mother? It was
6 difficult for me. It was painful for me to hear
7 something like that. I slept near her. I left my
8 husband, and I left my other children all alone.

9 She asks me -- the other ones are older.
10 They are 15 and they are 10. And they understand
11 what death means. But she -- she is too young to
12 understand. And I can't enter this concept into her
13 mind what is death. It was difficult for me to
14 explain to a young kid what does it mean to kill a
15 person. I tell her he went, he went and left to be
16 with Jesus, and he went to play with Jesus the board
17 game.

18 She asks me: Who will bring him the tools
19 to play on the board?

20 And I tell her: They will manage. They
21 will play.

22 And once she became more -- once she
23 became older, she understood more. She saw the
24 picture. She sees his picture on my breast. And
25 she understands. And she keeps telling me: Don't

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2 be sad. Don't be sad. God's mercy upon him.

3 Even the older children, when they are
4 at school, they cry. The teachers try to calm them
5 down. Once one of them wrote an essay at school
6 about their uncle.

7 My older child, the 19 years and a half
8 old, Sohaila, she got engaged. Her uncle will
9 remain always in front of her, all her life.

10 Her fiance knew her uncle. He worked with
11 him. He asked once her uncle about her. And he
12 asked him once also to replace him at work. He was
13 supposed to be visiting in Jerusalem friends. His
14 name is Elias. But they weren't able to replace, to
15 exchange them between them. So her uncle died and
16 her fiance lived. Although they didn't know each
17 other from before, if they were able to change
18 places between them, that meant her fiance would
19 have died.

20 Q. BY MR. MONSOUR: Have your mother or
21 father received any sort of psychological counseling
22 in connection to your brother's death?

23 A. There used to be a woman from the
24 insurance that comes and talked to her. And now
25 there are like meetings for all the families that

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2 have lost ones. So they go and talk with each other
3 about it.

4 At the beginning, it was only them going
5 to her and talking to her. But then they included
6 the meetings for all the families to go out and
7 meet.

8 Q. How often would they go to these meetings?

9 A. I'm sorry. I don't know. I cannot
10 exactly say for sure. Maybe three to four months
11 or maybe two to three months. I really don't know.
12 I cannot answer this question.

13 Q. For how long of a period of time would you
14 estimate that, as you say, you stopped taking care
15 of yourself and stop caring about your appearance?

16 A. For a whole year. Not only me. Also my
17 sister. My sister was even more than me. I used
18 to, for example, sometimes go and, with a tweezer,
19 take out one -- fix it, fix a problem here or there.
20 But my sister wouldn't even touch her face.

21 Q. Have your children received any sort of
22 psychological counseling?

23 A. No. Thank God they have a father that
24 there's no one better than him, and there is no one
25 as good-hearted as him. So their father was like

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2 their doctor.

3 Q. Do you take any medications for sleeping?

4 A. No. My husband was my medicine. I put my
5 head on his breast.

6 Q. I believe you stated that you left your
7 family for a period of time.

8 What were you referring to?

9 A. We had family problems, a bit of small
10 family problems.

11 Q. What were these problems?

12 A. Simple problems. And when they tried to
13 interfere, I used to take a distance so they don't
14 interfere in our lives.

15 Q. Who's the "they" that you're referring to?

16 A. My father and my mother.

17 Q. Just so I can be clear for the record, can
18 you give me an idea of what kind of problems your
19 parents were trying to interfere with you and your
20 husband?

21 A. Don't you think that these things are
22 personal?

23 Q. These problems that you were suffering
24 with your husband, are you claiming these as
25 injuries related to your brother's death?

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2 A. No, no, no. These problems were before
3 my brother died. When he died, thank God nothing
4 happened. (Indicating.)

5 MR. MONSOUR: I'm glad you did that.

6 THE INTERPRETER: It's like an Arabic
7 thing.

8 Q. BY MR. MONSOUR: Ms. Karkabi, I will not
9 ask you about these problems.

10 A. I will respect you.

11 I'm getting hungry.

12 MR. MONSOUR: Ms. Karkabi, I have no
13 further questions at this time. I thank you for
14 being here for this deposition.

15 THE WITNESS: Thank you. Can I breathe?

16 MR. MONSOUR: Well, maybe not yet.

17 MR. EUBANKS: Ms. Karkabi, I do have some
18 follow-up questions. Before we do that, would you
19 like to take a break before I ask you my questions?

20 THE WITNESS: As you like. As you would
21 see fit. But before anything else, you wrote my
22 name incorrectly in Arabic. Fatima, you don't write
23 that way.

24 MR. MONSOUR: Fatima. "Beautiful."
25 "Beautiful."

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2 THE WITNESS: So you know Arabic.

3 (Recess from 4:21 p.m. to 4:32 p.m.)

4 MR. EUBANKS: Back on the record.

6 EXAMINATION

7 BY MR. EUBANKS:

8 Q. Ms. Karkabi, you testified earlier that,
9 on the day of the terrorist attack, you spoke with
10 the police; is that correct?

11 A. That's correct.

12 Q. What did you tell the police that day?

13 A. They asked me if I saw him the last time,
14 what he was wearing. They also asked me if there is
15 something facially special about him, if there is
16 kind of like a birthmark or something. So I said
17 exactly what is special about him.

18 Q. When was the last time that you saw your
19 brother?

20 A. On the 4th of October between 9:00 and
21 9:00 and a half in 2003.

22 Q. And when you say between 9:00 and 9:00 and
23 a half, is that 9:30 in the morning?

24 A. Yes.

25 Q. Where did you see your brother that day?

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2 A. I saw him when he was heading to work on
3 Caesarea Street. On that road I saw him.

4 Q. How often would you see your brother?

5 A. On a daily basis.

6 Q. How would you see him on a daily basis?

7 A. He used to come and visit us.

8 Q. What did he do when he came to visit you?

9 A. We used to sit and talk, to play with the
10 kids, and also play with my husband the board game.

11 Q. How old was your brother when he was
12 killed?

13 A. Thirty-one years old.

14 Q. Was he married?

15 A. Yes, he was.

16 Q. What was his wife's name?

17 A. Sumar.

18 THE INTERPRETER: S-u-m-a-r.

19 Q. BY MR. MONSOUR: And have you remained in
20 touch with his wife following his death?

21 A. Of course, yes.

22 Q. Where does she live?

23 A. She lives in Haifa. But for the time
24 being, she's in Nazareth with her mother because
25 she's sick and she's standing by her side because

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2 she needs her.

3 Q. Did she remarry?

4 A. No.

5 Q. Do you remember what year it was that they
6 got married?

7 A. They got married in 2001, I think.

8 Q. Did you attend the wedding?

9 A. Of course. And I also danced.

10 Q. Were you a participant in the wedding?

11 A. Surely. It's my brother. How come I
12 would not participate in his own wedding?

13 Q. Do you know how often your brother would
14 see your other siblings?

15 A. Do you mean from his wife's side?

16 Q. No. The siblings that you and your
17 brother share.

18 A. It wasn't on a daily basis. But it was
19 maybe once or twice a week.

20 Q. Can you tell me the names and ages of your
21 siblings, excluding your brother Mutanus?

22 A. Afif. He could be 44 or 43. Milad. I
23 think he's 42, possibly two years older than me.
24 Now, of course, me. And I'm 40 years old. Soad.
25 She's 38 and a half years old.

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2 Q. Were there occasions when your whole
3 family would get together, including your brothers,
4 sisters, and parents?

5 A. Of course. That's for sure. Birthdays,
6 New Year, Easter, weddings, and anything that is
7 related as an occasion for the family. Many times
8 we also used to meet in the family house.

9 Q. Where was the family house located?

10 A. Hatzinut Street where my father and mother
11 live. This is what I mean by the family house.

12 Q. Do the members of your family, meaning
13 your siblings and your parents, live close to one
14 another?

15 A. Kind of, yes. My two brothers, they live
16 on top of each other's floor. They are not far from
17 the family house. It's about a seven-minute walk.
18 My sister is also not very far away. She is about
19 five minutes away. Only me living away from the
20 family house. I need a car. And if I want to walk,
21 it means about 15 or 20 minutes.

22 Q. You stated that you recently moved.

23 Was your previous house closer to your
24 family house?

25 A. Yes, it was closer. Walking then, it took

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2 about the same as it takes with my brothers now,
3 seven to ten minutes.

4 Q. Do you know what level of education your
5 brother Mutanus achieved?

6 A. He finished with a 12th elementary.
7 And as I told you before, he also studied as an
8 insurance agent.

9 Q. Was his job at the restaurant only a
10 part-time job?

11 A. Yes.

12 Q. Did he have a full-time job at that time?

13 A. No. No. His job was not good. His job
14 was kind of connected, disconnected.

15 Q. What do you mean by it was connected and
16 disconnected?

17 A. He used to jump from one place to another.
18 He didn't have one particular job in one certain
19 location.

20 Q. When you say he jumped from one place to
21 the other, does it mean that he jumped from one
22 company to another, or were these positions within
23 the same company?

24 A. No. He wasn't in charge in a certain
25 particular company. But he was jumping from one job

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2 into the other in general.

3 Like, for example, he will do the framing
4 job for somebody, or he will work as a bodyguard or
5 to fix something or deal with a kind of electricity
6 problem.

7 Q. You stated earlier that, after your
8 brother's body had been identified and it was
9 confirmed that he had died in the attack, that your
10 home was open for condolences; is that correct?

11 A. Correct.

12 Q. And how long was your home open for
13 condolences?

14 A. You mean the condolences where we received
15 condolence?

16 Q. Yes, when you received condolences.

17 A. Nearly about three weeks. In general,
18 they stay about a week, three, four days. But for
19 that particular thing, it was about for three weeks.

20 Q. To the best of your recollection, who came
21 to give your family their condolences?

22 A. All those we know, relatives. People that
23 we also don't know. And also -- what's his name --
24 Azmi Beshara, if I'm not mistaken. I was not
25 present then, but my husband was. Many people came.

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2 And also his friends that we don't know.

3 And also many Jews, not a few. Many,
4 many. And many actually sent condolences cards, not
5 only from Haifa, but also from outside of Haifa.
6 And also many sent rose bouquets.

7 Q. You stated earlier that you would see your
8 brother Mutanus every day.

9 Why would you see him every day?

10 A. Because he used to come to spend time with
11 us. He used to come and spend time and spend the
12 night. It's a normal thing where a brother visits
13 his sister.

14 Q. Earlier you stated that after your brother
15 died was when you began working between eight and
16 nine and a half hours a day.

17 Do you recall that?

18 THE INTERPRETER: Could you repeat the
19 question, please?

20 Q. BY MR. EUBANKS: Earlier you stated that
21 after your brother died was when you began working
22 eight to nine and a half hours per day.

23 Do you recall that?

24 A. No, I didn't say so. I said until 1:00 or
25 2:00 and then go home. But now I started working

1 F. KARKABI

2 more.

3 Q. When did you start working more?

4 A. After we finished the mourning period.
5 That was after one year.

6 Q. Was this amount that you were working
7 after the mourning period more than you had worked
8 prior to when your brother was killed?

9 A. Yes. And now even for this period of
10 time, it's way much more.

11 Q. Why are you working much more?

12 A. To forget.

13 Q. To forget what?

14 A. To forget about it, to get out of the
15 grief. I don't want to always be at home and always
16 remember and cry. I want to get out of this thing.

17 Q. When you say "this thing," what do you
18 mean?

19 A. To actually escape grieving, to run away
20 from the memories, beautiful memories. It affects
21 me a lot to remember in every corner that he used to
22 play with the kids. And on the balcony, he used to
23 sit with my husband. I actually go to work to
24 escape those corners of the house.

25 Q. Are there other things that you do to

1 F. KARKABI

2 escape those corners of the house?

3 A. No. It kind of helped me to forget a
4 little bit -- it's not the whole thing. But when
5 I sit with women like me and we discuss problems,
6 I kind of also forget. I go out of the house. It
7 helps me forgetting. But when I go back to the
8 house, it comes back to me.

9 Q. Ms. Karkabi, can you tell me what impact
10 it has had on your father, as you put it earlier, to
11 see your mother wearing black and constantly crying?

12 A. He's always upset. He's always angry.
13 He always tries to take her out, to visit relatives,
14 to take her out of it. It actually made him very
15 upset. It affects him. Definitely it does. It's
16 something that you cannot see, but it's deep down in
17 his own heart. He's a man who usually does not show
18 that. He doesn't talk about him, but we know.

19 Q. And you stated earlier that, after your
20 brother died, you never went back to church; is that
21 correct?

22 A. Correct.

23 Q. Did you regularly go to church prior to
24 your brother's death?

25 A. I cannot say that I used to go there on

1 F. KARKABI

2 a daily basis. But on occasion, for occasions,
3 we used to go there. And also on Saturdays. We
4 couldn't go on a Sunday because it was a working
5 day for us. And, again, we used to go there on
6 Saturdays.

7 Q. Were church services held on Saturdays?

8 A. Yes. There was one service at night.
9 Because many Christians couldn't go on a Sunday
10 because many of them actually work on Sunday.

11 Q. Was it for this Saturday service that you
12 would go to church?

13 A. Yes. And also, when I didn't have
14 something to do on a Sunday, I used to go down to
15 the church with my kids on a Sunday.

16 Q. Why did you never go back to church after
17 your brother died?

18 A. Because I felt that God -- because God
19 is unjust. This restaurant is owned by Christian
20 people. They have also the photo of Miriam in the
21 restaurant.

22 Why God didn't stop that woman? Why he
23 didn't persuade her to go back? Why he didn't teach
24 her? Why he couldn't do something about it? Why he
25 would allow murder?

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2 He told us to love. And there is only
3 hate in the world. And there is only famine in the
4 world. I also ask myself many questions, and there
5 is no answer. And that is why I went backwards with
6 regard to my belief.

7 Q. You testified earlier that you sold your
8 house.

9 A. In that house, I used to be very
10 miserable. And my psychological status was really
11 bad. My husband wanted me to be relieved of it, and
12 he wanted to help me. So he decided to leave that
13 house. That's it.

14 Q. And, Ms. Karkabi, I believe you testified
15 earlier that you identify yourself as a Palestinian;
16 is that correct?

17 A. Correct. But that doesn't mean -- I love
18 them. I love the Jews very much.

19 THE INTERPRETER: It was interrupted.

20 THE WITNESS: Yes, I am Palestinian, but
21 it doesn't mean that I don't love the Jews. I love
22 them very much.

23 I also work for a widow with two kids.
24 And I worry for them, and I cook for them. And I
25 even take care of them when they're sick, check

1 F. KARKABI

2 their fever. I love them very much.

3 Q. BY MR. EUBANKS: Ms. Karkabi, are you also
4 an Israeli citizen?

5 A. Correct. Yes. Yes. It works like that.
6 It works like that. And before everything, I am a
7 human being.

8 Q. What is the name of the church that you
9 attend?

10 A. The Catholic church.

11 Q. Does it have a proper name for the church?

12 A. No, there isn't. It's the orthodox Greek
13 Catholic church.

14 MR. EUBANKS: I have no further questions.

15 MR. MONSOUR: I have no questions.

16 (The deposition concluded at 5:08 p.m.)
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1 F. KARKABI

2 CERTIFICATE OF REPORTER

3
4 I, BRENDA MATZOV, CA CSR 9243, do hereby
5 certify:

6 That the foregoing deposition was taken
7 before me at the time and place herein set forth,
8 at which time the aforesaid proceedings were
9 stenographically recorded by me and thereafter
10 transcribed by me;

11 That the foregoing transcript, as typed,
12 is a true record of the said proceedings;

13 And I further certify that I am not
14 interested in the action.

15
16 Dated this 5th day of August, 2008.

17
18 _____
19 BRENDA MATZOV, CA CSR 9243
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F. KARKABI

NAME OF CASE: ALMOG v. ARAB BANK, PLC

1. To clarify the record.
2. To conform to the facts.
3. To correct transcription errors.

FATIMA KARKABI, Witness